



HON. SYLVIA O. HINDS-RADIX  
*Corporation Counsel*

THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
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PETER L GERMANAKOS  
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April 28, 2022

**VIA ECF**

Hon. Katherine Polk Failla  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

**MEMO ENDORSED**

Re: *A.K. v. NYC Dep't of Educ.* 21-4428 (KPF)(DCF)

Dear Judge Failla:

I am a Special Assistant Corporation Counsel in the office of Corporation Counsel, the Hon. Sylvia O. Hinds-Radix, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, et seq. ("IDEA"), as well as for this action.

I write to respectfully request a 30-day extension of the parties' time to file a joint status letter, from May 2, to June 1, 2022. Plaintiff consents to this request. This is the first request to extend the parties' time to file the status letter.

The requested extension will allow the parties to resolve this matter, as the parties are actively engaged in negotiation discussions. As with all but one of the dozens of similar IDEA fees-only cases brought by the Roller Firm, which have settled without any motion practice, we are hopeful that this matter will be resolved without the need for any Court intervention.

Accordingly, Defendant respectfully requests a 30-day extension of the parties' time to file a joint status letter, to June 1, 2022.

Thank you for considering this request.

Respectfully submitted,

/s/

Peter L. Germanakos  
Special Assistant Corporation Counsel

cc: Irina Roller, Esq. (via ECF)

Application GRANTED. The parties shall file a joint status letter on or before June 1, 2022, either informing the Court that the matter has been fully resolved or proposing a briefing schedule for a fees motion. This matter shall continue to be stayed pending the filing of that status letter. The Clerk of Court is directed to terminate the pending motion at docket number 23.

Dated: April 28, 2022  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE